



PROGRESS REPORT NO. 127

TO: Laura Buelow, U.S. Environmental Protection Agency (EPA) – via Email
Kathryn Cerise, EPA – via Email

FROM: Kris McCaig – Teck American Incorporated (TAI)

DATE: February 9, 2017

FILE NO: 01-773180-000

RE: Upper Columbia River (UCR) Remedial Investigation/Feasibility Study
(RI/FS) - Progress Report No. 127 Month Ending January 2017

Pursuant to Paragraph 39 of the June 2, 2006 Settlement Agreement (Agreement), the following is intended to provide a summary of activities completed during the past month in compliance with the aforementioned Agreement. It is also intended to provide a brief summary of pending and on-going activities.

Phase 2 Sediment Study - TAI in receipt of EPA's the December 9, 2016 letter transmitting EPA's comments on the December 2015 draft Phase 2 Sediment Study Data Summary and Data Gap Report (DSR). TAI is currently evaluating and revising the document in response to the comments however, on December 20, 2017 TAI submitted a letter to EPA requesting an extension of the deadline to deliver the revised report and response to comments from January 10, 2017 to April 10, 2017 (90 days from the original deadline). EPA approved the extension in a letter dated January 9, 2017.

Sediments – TAI is in receipt of a letter from EPA dated December 14, 2016 in which EPA presented a Statement of Finding (SOF) the Agency used to draw conclusions about risk to the benthic community in a portion of the UCR Site. EPA proposed a technical meeting to discuss the SOF and associated data and TAI agreed. The meeting was held on January 31, 2017 and follow-up discussions between the EPA and TAI Project Managers and the Program Manager will occur in early February.

Benthic Macroinvertebrate Tissue Study – Following completion of the summer/fall field sampling TAI revised the sample compositing plan and submitted a draft final version to EPA on October 27, 2016. EPA provided a revised approach to the compositing plan in an email to TAI on December 7, 2016 and met with TAI on December 12, 2017 to discuss the approach. During December 12 call, TAI requested EPA provide a memo detailing how the revised approach was developed and EPA provided the memo to TAI on December 21, 2016. TAI provided a response to EPA in a memo dated January 12,

2017 and EPA responded with a memo dated January 26, 2017. TAI is currently evaluating EPA's January 26 memo.

Recreation Consumption and Resource Use Survey – EPA provided the Draft Final Data Analysis Report (DAR) for the Recreational Use Survey to TAI on April 15, 2016 and TAI submitted review comments to EPA on June 10, 2016. TAI has postponed its review of the November 23, 2015 Memorandum written by SRC titled "Recreation Use Survey Fish Ingestion Rate" given that the memorandum referenced the following version of the DAR for the recreational use survey: "SRC, Inc. (2014). Data analysis report for the recreational use survey for the Upper Columbia River Site human health risk assessment and remedial investigation/feasibility study. Prepared under contract for the Environmental Protection Agency. January 16."

Tribal Consumption and Resource Use Survey – On June 27, 2016 EPA submitted the April 30, 2016 report titled "Statistical Review of a Report on Food Consumption and Resource Use among Residents of the Colville Reservation" as prepared by The Mountain-Whisper-Light Statistics for TAI to review and provide comment. TAI provided review comments to EPA on September 26, 2016.

2016 Residential Soil Sampling – TAI is in receipt of a letter from EPA dated January 10, 2017 granting a 30-day extension (to March 31, 2017) for delivery of the draft DSR to accommodate for the added time to select and obtain EPA approval of samples for in vitro bioaccessibility assay analysis (IVBA) and incorporate the full study data set into the draft DSR. TAI delivered the full set of residential soil study validated data with location information (including IVBA data) to EPA on January 16, 2017 for quality assurance review. EPA provided a memo to TAI on January 31, 2017 with results of their chemist's review of the data validation reports for the IVBA analyses.

White Sturgeon Sediment Toxicity Study – In January 2014 TAI submitted to EPA, the draft final version of the Assessment of Sediment Toxicity to White Sturgeon DSR and response to EPA's comments. On August 10, 2015 TAI met with EPA to discuss the draft final DSR and TAI's response to comments and clarify further changes needed in order to revise the DSR. TAI submitted a revised DSR and revised response to comments to EPA on November 20, 2015.

Soil Amendment Technologies Evaluation Study – A technical webinar was held on January 11, 2017 between EPA and TAI to discuss the initial data quality objectives drafted by EPA and the additional information provided by EPA in letters dated June 21, 2016 and December 6, 2016 respectively. Following the call, on January 18, 2017 TAI provided a rough "Phase 1" schedule up through the initial data-gathering phase. EPA responded with comments on the draft schedule and the team started working to schedule an initial study systematic planning meeting to be held in spring 2017.

Analytical Support for Sturgeon Sampling Effort – The nine sturgeon fillet composite samples have been processed and analyzed, data were validated, and were submitted to

EPA for quality assurance review on December 19, 2016. EPA provided a memo to TAI on January 4, 2017 with results of their chemist's review of the data validation reports. During TAI's preparation of the draft DSR, a discrepancy was noted with regard to the reporting limits for HRGC/HRMS analyses (dioxins/furans, PCB congeners, and PBDEs). The discrepancy occurred during the generation of Vista's lab EDD, and resulted from a misinterpretation of the 2016 QAPP Addendum. TAI recommended to EPA that a new EDD be requested from Vista, and that the existing validation report be updated to reflect the change and EPA agreed. TAI submitted the updated validation report to EPA on January 23, 2017 and EPA responded with a chemist's review memo on January 31, 2017. At the time of writing, the final validated data was uploaded to the UCR RI/FS database web tool on February 6, 2017 and is available to all web tool users. The final validation reports were also made available to all users on the same date. EPA submitted the revised draft field summary report (FSR) minus the appendices, for review on January 10, 2017 and TAI submitted comments to EPA on January 16, 2017. At the time of writing, EPA submitted the draft final FSR and appendices to TAI in an email on February 6, 2017.

Assessment and Estimations of Upland Soils on the UCR Site (background soil study) – TAI is in receipt of EPA's letter of December 2, 2016 requiring a response to EPA's July 22, 2016 formal transmittal of a Level of Effort for Assessment and Estimations of Upland Soils on the UCR site by January 9, 2017. EPA agreed to defer response to the LOE until after a meeting between EPA and Teck had occurred to discuss a study for delineation of the upland aerial footprint reflecting atmospheric deposition of Trail Facility emissions. At the time of writing, the meeting occurred on February 1, 2017 and on February 3, 2017 TAI received a letter from EPA indicating that there was nothing during the meeting discussion that EPA believed justified delaying the background study and therefore the fourteen-day period for TAI to invoke a dispute on EPA's direction to conduct the study had begun.

Plant Tissue Study – TAI is in receipt of a letter from EPA dated December 8, 2016 regarding approach for conducting plant tissue sampling and proposed that EPA develop the quality assurance project plan and lead the sampling program with Teck's funding. EPA required a response by January 13, 2017. EPA agreed to defer response to the LOE until after a meeting between EPA and Teck had occurred to discuss a study for delineation of the upland aerial footprint reflecting atmospheric deposition of Trail Facility emissions. At the time of writing, the meeting occurred on February 1, 2017 and on February 3, 2017 TAI received a letter from EPA indicating that there was nothing during the meeting discussion that EPA believed justified delaying the plant tissue study and therefore the fourteen-day period for TAI to invoke a dispute on EPA's direction to conduct the study had begun.

Delineation of Upland Aerial Footprint Reflecting Atmospheric Deposition of Trail Facility Emissions – TAI requested and EPA agreed that a meeting to discuss a delineation/footprint study will occur before the above reference background soil and plant tissue studies proceed. The meeting was scheduled and at the time of writing, took

place on February 1, 2017. EPA and TAI are evaluating the information that was presented during the meeting.

Should you have any questions or require any additional information, please do not hesitate to contact me at 509-623-4501.